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PRE-APPEAL BRIEF REQUEST FOR REVIEWDocket Number (Optional)
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Name _____Application Number
09/988,155Filed
November 19, 2001First Named Inventor
Jean SiniArt Unit
2163Examiner
H. Thai**Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request.****This request is being filed with a notice of appeal.****The review is requested for the reason(s) stated on the attached sheet(s). Note:
No more than five (5) pages may be provided.**

I am the

☐ applicant/inventor.☐ assignee of record of the entire interest. See 37 CFR 3.71.
Statement under 37 CFR 3.73(b) is enclosed. (Form PTO/SB/96)☒ attorney or agent of record.
Registration number
58,572☐ attorney or agent acting under 37 CFR 1.34.
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October 18, 2007

Date

NOTE: Signatures of all the inventors or assignees of record of the entire interest or their representative(s) are required.
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**APPLICANTS' REMARKS IN SUPPORT OF THE
PRE-APPEAL BRIEF REQUEST FOR REVIEW**

The Examiner rejected claims 1-3, 5, 10-12, 14, 19-21, 23, and 28-30 under 35 U.S.C. § 103(a) as being obvious over U.S. Patent Publication No. 2002/0107755 to Steed *et al.* ("Steed") in view of U.S. Patent Publication No. 2002/0010715 to Chinn *et al.* ("Chinn"). The Examiner also rejected claims 1-3, 5, 10-12, 14, 19-21, 23, and 28-30, not the subject of this pre-appeal brief request for review, under 35 U.S.C. § 112(2) as being indefinite.

As set forth in detail below, Applicant submits that the Examiner's basis for the § 103(a) rejection is improper because the combination of Steed and Chinn does not establish a *prima facie* case of obviousness. Specifically, Chinn does not teach the creation of a mapping for a form based on information received from a user of a mobile device, a feature recited in each of the three independent claims.

The Rejections of Claims 1-3, 5, 10-12, 14, 19-21, 23, and 28-30 under 35 U.S.C. § 103(a)

To establish a *prima facie* case of obviousness under § 103(a), the Examiner must show that, *inter alia*, the prior art references, when combined, teach or suggest all of the claim limitations. *See, e.g.*, MPEP § 2142. In this regard, Applicant submits that the Examiner's rejection lacks merit. That is, the rejection of independent claims 1, 10, and 19 are improper because at least one element of each of these claims is not taught by the cited references, either alone or in combination.

One embodiment of the present invention comprises a method for automatically entering information into form fields. The method includes invoking an application program in response to an indication from a user of a mobile device to do so. *See, e.g.*, Claim 1. Content transmitted from the application program to the mobile device is scanned to find a form having at least one field into

which information is to be entered. *Id.* When at least one mapping for a form exists, the present invention retrieves and enters information into the at least one field and transmits the form, including the entered information, to the mobile device for display to the user. *Id.*

However, when no mappings for the form exist, the present invention transmits the form to the mobile device. *Id.* Then, at least one selection of information to be entered into the at least one field of the form is received from the user of the mobile device. *Id.* A mapping that specifies how to fill-in fields in the form is then created. *Id.* The created mapping is based on the at least one selection of information that is received from the user of the mobile device. *Id.* The form including the at least one selection of information is then transmitted to the application program. *Id.*

The Examiner concedes that Steed does not disclose creating a mapping for the form. *See, e.g.,* April 18, 2007 Office Action at page 4. Indeed, Steed explicitly states that when a mapping does not exist, it “plays no further part.” *See, e.g.,* Steed at para. 0022 and Response to Office Action filed January 22, 2007 at pages 8-9.

To cure this deficiency, the Examiner cites Chinn, which discloses a system and method for browsing using a limited display device. Along these lines, Chinn discloses a processor that converts a conventional markup language document into a navigation tree that provides a semantic, hierarchical structure that includes some or all of the content included in the web pages presented by the convention markup language documents. *See* Chinn at para. 0006. For each conventional markup language document, Chinn constructs a document tree that has a number of nodes. *See* Chinn at para. 0009.

In order to construct the document tree, Chinn uses metadata, such as declarative statements and procedural statements. *See* Chinn at para. 0008. If procedural statements are present, Chinn applies these to construct a navigational tree. *See* Chinn at para. 0009. If there are no procedural

statements, Chinn applies a mapping procedure to convert the document tree into a navigation tree.

Id. A user can navigate through the web pages and access the content stored on the site by traversing the nodes in the navigation tree. *See* Chinn at para. 0010. Chinn further discloses that a form in a document tree can be mapped to create a form node in a navigation tree. *See* Chinn at para. 0113.

Chinn, therefore, is related to forming navigation trees. Thus, the “mapping” disclosed by Chinn relates to a form that can be mapped to create a form node in a navigation tree. Chinn does not disclose creating a mapping for a form that specifies how to fill-in fields in the form into which stored information is to be entered based on a received selection of information for the form. *See, e.g.,* Response to Office Action filed Jun 27, 2006 at pages 11-12. In fact, Chinn does not teach or suggest creating a form node in a navigation tree based on any user input whatsoever. As such, even a strained interpretation of the cited portions of Chinn does not teach or suggest creating a mapping in the manner recited in claims 1, 10, and 19 of the present application.

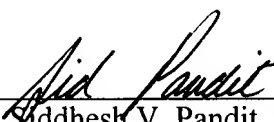
In sum, the combination of Steed and Chinn fail to establish a *prima facie* case of obviousness. In particular, Steed explicitly states that it takes no further action if a mapping for a form does not exist. Moreover, Chinn does not teach, or even suggest, creating a mapping for a form that specifies how to fill-in fields in the form. The portions of Chinn cited by the Examiner similarly fail to teach creating a mapping based on at least one selection of information that is received from a user. Because Chinn fails to teach or suggest features of the present invention recited in the independent claims, Applicant submits that the Examiner’s § 103 rejections are improper, and must be withdrawn.

CONCLUSION

In light of the deficiencies in the Examiner's obviousness rejections under 35 U.S.C. § 103(a), Applicant respectfully requests reconsideration and issuance of a Notice of Allowance for claims 1, 10, and 19.

Respectfully Submitted,

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